

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION**

No. 3:23-md-03084-CRB

**PLAINTIFF'S PROPOSED VERDICT  
FORM**

This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
N.D. Cal. No. 23-cv-06708  
D. Ariz. No. 25-cv-4276

**JURY VERDICT FORM**

**NEGLIGENCE**

1. Do you find Uber liable for Negligence? Yes\_\_\_ No\_\_\_

**DESIGN DEFECT**

2. Do you find Uber liable for Design Defect? Yes\_\_\_ No\_\_\_

**Employer Liability**

3. Do you find that Uber liable as an Employer? Yes\_\_\_ No\_\_\_

**Apparent Agency**

4. Do you find Uber liable for Apparent Agency? Yes\_\_\_ No\_\_\_

**COMPARATIVE FAULT**

5. What percentage of fault do you allocate to each of Uber, Hassan Turay, and Jaylynn Dean?

Uber: \_\_\_%

Turay: \_\_\_%

Dean: \_\_\_%

Total: **100%**

*Any percentage you assign to Jaylynn Dean will reduce the damages Uber pays. Any percentage you assign to Hassan Turay will reduce the damages Uber pays for Negligence and Design Defect claims only. It will not reduce the damages Uber pays for Employer Liability or Apparent Agency. The Court will apply any appropriate reductions.*

**COMPENSATORY DAMAGES**

6. In what amount, if any, was Plaintiff Jaylynn Dean damaged?

\$\_\_\_\_\_

**PUNITIVE DAMAGES**

7. What is the total amount of punitive damages, if any, that should be assessed against Uber?

\$\_\_\_\_\_

\_\_\_\_\_  
Jury Foreperson